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Attorneys for Defendants Kaiser Aluminum
Washington, LLC and Kaiser Aluminum
Fabricated Products, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MICHELLE ANDERSON, an individual,

Plaintiff,

vs.

KAISER ALUMINUM WASHINGTON,
LLC, a foreign corporation doing business
in the State of Washington; KAISER
ALUMINUM FABRICATED
PRODUCTS, LLC, a foreign corporation
doing business in the State of Washington;
"JOHN DOE I-V" employees, agents,
and/or independent contractors of KAISER
ALUMINUM WASHINGTON, LLC
and/or KAISER ALUMINUM

No.

DECLARATION OF JOHN DONNAN
IN SUPPORT OF NOTICE OF
REMOVAL

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OF NOTICE OF REMOVAL
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Winston & Cashatt
A PROFESSIONAL SERVICE CORPORATION
1900 Bank of America Financial Center
601 West Riverside
Spokane, Washington 99201
(509) 838-6131

1 FABRICATED PRODUCTS, LLC; and
2 "UNKNOWN BUSINESS ENTITIES I-
3 V", jointly and severally,
Defendants.

4
5 JOHN DONNAN declares as follows:

6 1. I am the Chief Administrative Officer and General Counsel for Kaiser
7 Aluminum Corporation, which is the parent company for all Kaiser Aluminum
8 entities.
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10 2. I have personal knowledge of the business structure of Kaiser
11 Aluminum Corporation and all Kaiser Aluminum entities.

12 3. Kaiser Aluminum Washington, LLC is a Delaware limited liability
13 company with its principal place of business in California. Its sole member is Kaiser
14 Aluminum Fabricated Products, LLC, a Delaware limited liability company with its
15 principal place of business in California. The sole member does not reside in
16 Washington State.
17

18 4. The sole member of Kaiser Aluminum Fabricated Products, LLC is
19 Kaiser Aluminum Investments Company, a Delaware corporation with its principal
20 place of business in California. The sole member does not reside in Washington
21 State.
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 EXECUTED this 31st day of MAY, 2021.

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5 _____
6 JOHN DONNAN

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of June, 2021, I caused the foregoing to be served on the following parties in the manner indicated:

Matthew F. Duggan
GLP Attorneys, P.S., Inc.
601 W. Main Ave., Suite 305
Spokane, WA 99201

Attorney for Plaintiff

VIA REGULAR MAIL
VIA CERTIFIED MAIL
HAND DELIVERED
BY FACSIMILE
VIA EMAIL

☐
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☒
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☐

s/Patrick J. Cronin

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